

U.S. Department of Justice

United States Attorney Eastern District of New York

271 Cadman Plaza East Brooklyn, New York 11201

July 21, 2025

By Email and FedEx
Robert H. Rickner
Rickner PLLC
14 Wall Street, Suite 1603
New York, New York 10005
rob@ricknerpllc.com

Elana L. Cohen
J. Remy Green
Jessica Massimi
Cohen & Green P.L.L.C.
1639 Centre Street, Suite 216
Ridgewood, New York 11385
elena@femmelaw.com
remy@femmelaw.com
jessica@femmelaw.com

Re: Eaddy v. United States of America, 24-cv-8109 (Kovner, J.)

Dear Counsel:

Pursuant to the Court's Scheduling Order dated July 4, 2025, enclosed find the following papers associated with Defendant's Motion to Dismiss the Complaint:

- 1. Defendant's Notice of Motion;
- 2. Defendant's Memorandum of Law in Support of Defendant's Motion to Dismiss;
- 3. Declaration of Joseph Santucci, dated July 21, 2025 (redacted); and
- 4. Declaration of Alexandra Megaris, dated July 21, 2025.

Please note, the Declaration of Joseph Santucci contains sensitive and confidential information relating to the Federal Bureau of Prisons Metropolitan Detention Center that has been redacted. Defendant can share an unredacted copy once the parties agree to the terms of a protective order.

Very truly yours,

JOSEPH NOCELLA, JR. United States Attorney

By: /Alexandra Megaris

ALEXANDRA MEGARIS Assistant U.S. Attorney (718) 254-6105

alexandra.megaris@usdoj.gov

Encl.

cc: Honorable Rachel P. Kovner, U.S.D.J. E.D.N.Y. (by ECF, without enclosures)